

April 9, 2019

Magistrate Judge Vera M. Scanlon
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: USA v. Raniere et al | 1:18-cr-00204-NGG-VMS

Dear Judge Scanlon:

Please accept this letter pursuant to your order dated April 8, 2019 (Dkt. 512) regarding the corporate issues discussed during the April 8, 2019, conference. I previously informed the Government that our Firm represents (and I understand our Firm continues to represent) the following entities:

- NXIVM Corporation d/b/a ESP (“NXIVM”) (Delaware, active);
- First Principles Incorporated (Virginia, active);
- Executive Housing & Properties, Inc. (Delaware, active);
- Moving Pixels, Inc. (Delaware, active);
- Executive Success Programs, Inc. (Nevada, active);
- NXIVM Properties, LLC (New York, active);
- Plugged-In Technologies, LLC (Delaware, active);
- Don’t be Dumb, LLC (Nevada, on administrative hold);
- Worldwide Network, LLC (New York, active);
- JNESS LLC (Delaware, active);
- Society of Protectors, LLC (Delaware, active).
- Poiesis, Inc. (California, Franchise Tax Board suspended status);
- World Audience Productions, Inc. (Delaware, active); and
- NXIVM Mexico.

Upon being retained, I understood that NXIVM had a board and that board provided direction to NXIVM Corporation d/b/a ESP. I was also provided a list of the above companies that identified the primary owners in order to confirm the entities request/authorization of our Firm’s representation of the above companies. At this time, I am unable to confirm the organizational structure of each of the above entities and if each entity has a separate corporate board or management structure beyond a primary owner. In order to confirm the organizational structures, I will need to locate the entities corporate and operational documents.

In addition to the above entities, I was recently requested to represent the companies identified below and per the Court’s request I am awaiting confirmation from the executor of Ms. Pam Cafritz’s estate of our continued representation. Once I am provided with this confirmation, I will update this Honorable Court.

- Ultima LLC (Delaware, active);
- The Source (Delaware, active);

- ExoEso LLC (Delaware, active);
- Buyer's Advocate, Inc. (Delaware, active);
- Geniuses LLC (New York, active);
- NXV Property Management Corporation (Delaware, active);
- NX Trust, Inc. (Delaware, active);
- One Asian, LLC (Delaware, active); and
- Worldwide Nodes, LLC (Delaware, active).

Our Firm is retained for purposes of providing legal advice and guidance in connection with this case. During the course of our representation, our Firm was instructed by those individuals with authority, to interact with the Government on behalf of the Clients, and, as necessary, to retain services to assist us in locating, examining, and providing non-privileged/responsive documents to the Government. Without waiving attorney-client privilege, I understood from each of the Clients that I should assert privilege regarding documents and attorney work-product when appropriate and that I should not unilaterally waive privilege on behalf of any of the Clients. Client direction regarding representation, reviewing documents, work-product, and asserting privilege has not changed.

If you have any questions or require further clarification regarding this letter, please do not hesitate to contact me.

Sincerely,

/s/ Michael J. Sullivan
Michael J. Sullivan